

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

V.

JANIS JEAN FOWLER-GULDE

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Criminal Case No. 4:18-CR-713

DEFENDANT’S UNOPPOSED MOTION TO EXTEND SURRENDER DATE

NOW COMES Defendant, JANIS JEAN FOWLER-GULDE, by and through her counsel, JONATHAN MELTZ, who respectfully moves this Honorable Court for an Order granting a 60-day extension of the surrender date for Dr. Gulde to begin serving her prison sentence and as grounds therefore, states as follows:

1. Undersigned counsel conferred with Trial Attorney Devon Helfmeyer regarding this motion and the Government does not object to the granting of an extension.

2. On March 28, 2022, this Honorable Court sentenced Dr. Gulde to be committed to the custody of the Bureau of Prisons for a term of 15 months.

3. By order of the Court entered April 25, 2022, Dr. Gulde was ordered to surrender to the federal prison camp in Bryan, Texas by 2:00 p.m. on June 21, 2022.

4. After sentencing, Dr. Gulde began preparations to get her affairs in order so she was ready to surrender as ordered by the Court. Amongst many personal tasks and objectives, Dr. Gulde aimed to obtain required medical care and treatments and organize her financial and family affairs. For her professional obligations, Dr. Gulde began planning for her medical practice and to provide for the care and treatment of her patients.

5. Dr. Gulde has not yet completed her professional arrangements for the operation of her medical practice and the care and treatment of her patients.

6. Dr. Gulde retained the ByrdAdatto law firm and attorney Michael Byrd to assist in the transition of ownership of the practice from Dr. Gulde to another physician. Mr. Byrd has provided a letter confirming his firm's representation of Dr. Gulde. See Exhibit "1".

7. According to Mr. Byrd, the documentation and transition of practice ownership and patient care typically takes ninety days to accomplish. Mr. Byrd expressed it becomes difficult, if not impossible, to maintain patient care and to document appropriately the transition of ownership if the owner is not available.

8. If Dr. Gulde surrenders to begin serving her prison sentence as scheduled on June 21, it will be extremely difficult to properly effectuate the ownership transition of Dr. Gulde's medical practice and to maintain proper patient care.

WHEREFORE, for the reasons stated herein, Defendant JANIS JEAN FOWLER-GULDE, by and through her counsel, JONATHAN MELTZ, respectfully requests that this Honorable Court grant a 60-day extension of the June 21, 2022 surrender date for Dr. Gulde to begin serving her prison sentence.

Respectfully submitted,

CHAPMAN LAW GROUP

Dated: June 16, 2022

/s/ Jonathan Meltz
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Unopposed Motion to Extend Surrender Date was delivered via electronic filing to the DOJ Trial Attorney, Devon Helfmeyer, on June 16, 2022.

/s/ Jonathan Meltz

JONATHAN MELTZ

CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned, Jonathan Meltz, has spoken with the DOJ Trial Attorney in this cause, Devon Helfmeyer, who stated he has no objection to this motion.

/s/ Jonathan Meltz

JONATHAN MELTZ